

FLICKER, GARELICK & ASSOCIATES, LLP  
45 Broadway  
New York, New York 10006  
(212) 319-5240  
Attorneys for Respondents

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
:  
PATRICIA IRBY (on behalf of the minor :  
children of STEPHEN S. HELVENSTON, :  
deceased), JUNE BATALONA (widow of WESLEY :  
BATALONA), :  
:  
Petitioners, : Case No.  
:  
v. : 07-cv-5939  
:  
ECF Case  
:  
BLACKWATER SECURITY CONSULTING, LLC, :  
FIDELITY & CASUALTY COMPANY OF NEW :  
YORK/CNA INTERNATIONAL, and DIRECTOR, :  
OFFICE OF WORKERS' COMPENSATION PROGRAMS, :  
UNITED STATES DEPARTMENT OF LABOR, :  
:  
Respondents. :  
:  
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RULE 7.1 STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1  
[formerly Local General Rule 1.9] and to enable District Judges  
and Magistrate Judges of the Court to evaluate possible  
disqualification or recusal, the undersigned counsel for  
Respondents Blackwater Security Consulting, LLC and Fidelity &  
Casualty Company of New York/CNA International (private non-

governmental parties) certifies that the following are corporate parents, affiliates and/or subsidiaries of said parties, which are publicly held:

(1) Respondent Blackwater Security Consulting, LLC is a wholly-owned subsidiary of The Prince Group. No publicly-held company owns ten percent (10%) or more of the stock of Blackwater Security Consulting, LLC.

(2) Respondent Fidelity & Casualty Company of New York/CNA International has no corporate parent. In addition, no publicly-held company owns ten percent (10%) or more of the stock of Fidelity & Casualty Company of New York/CNA International.

Dated: New York, New York  
July 23, 2007

FLICKER, GARELICK & ASSOCIATES, LLP  
Attorneys for Respondents Blackwater  
Security Consulting, LLC and Fidelity  
& Casualty Company of New York/CNA  
International

By:



Keith L. Flicker (KF-6447)  
45 Broadway  
New York, New York 10006  
(212) 319-5240

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BLACKWATER SECURITY CONSULTING, LLC, :  
FIDELITY & CASUALTY COMPANY OF NEW :  
YORK/CNA INTERNATIONAL, and DIRECTOR, :  
OFFICE OF WORKERS' COMPENSATION PROGRAMS, :  
UNITED STATES DEPARTMENT OF LABOR, :

Respondents.

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Case No.  
07-cv-5939  
  
ECF Case

PROOF OF SERVICE

Keith L. Flicker, Esq., of full age, upon his oath,  
under penalty of perjury states that:

1. I am an Attorney at Law of the State of New York  
admitted to practice before the United States District Court for  
the Southern District of New York and am a Partner of the law  
firm of Flicker, Garelick & Associates, LLP, attorneys for



Respondents Blackwater Security Consulting, LLC and Fidelity & Casualty Company of New York/CNA International.

2. On July 23, 2007, I served copies of the foregoing Rule 7.1 Statement by way of first class mail upon:

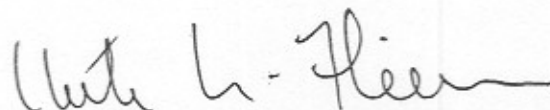
**Attorneys for Petitioners  
Patricia Irby and June Batalona:**

Marc P. Miles, Esq.  
Callahan & Blaine, APLC  
3 Hutton Centre Drive - Suite 900  
Santa Ana, California 92707

**Attorneys for Respondent Director,  
Office of Workers' Compensation Programs,  
United States Department of Labor:**

Matthew Boyle, Esq.  
United States Department of Labor  
Office of the Solicitor  
200 Constitution Ave., N.W.  
Suite N-2117  
Washington, D.C. 20210

Dated: New York, New York  
July 23, 2007

  
Keith L. Flicker (KF-6447)